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MARGULIES, WIND, HERRINGTON & KNOPF

A Professional Corporation
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Attorneys for Michael S. Abrams, Ph.D.

FILED WITH THE BOARD OF
PSYCHOLOGICAL EXAMINERS
ON November 21, 1997

**STATE OF NEW JERSEY
DEPARTMENT OF LAW & PUBLIC SAFETY
DIVISION OF CONSUMER AFFAIRS
STATE BOARD OF PSYCHOLOGICAL
EXAMINERS
STATE BOARD OF MEDICAL EXAMINERS**

IN THE MATTER OF THE SUSPENSION
OR REVOCATION OF THE LICENSES OF
MICHAEL S. ABRAMS, Ph.D. AND
LIDIA DENGELI, Ph.D.
TO PRACTICE PSYCHOLOGY, AND OF
SALVATORE NAPOLI, M.D.
TO PRACTICE MEDICINE AND
SURGERY IN THE STATE OF NEW
JERSEY

ADMINISTRATIVE ACTION

ANSWER

MICHAEL S. ABRAMS, Ph.D., through his attorneys Margulies, Wind, Herrington
& Knopf, by way of answer to the complaint says:

1. Michael S. Abrams, Ph.D. (hereinafter "Abrams") admits the allegations in
paragraphs 1, 2, 3 and 7.

2. Abrams maintains his practice at 135 Palisades Avenue, Jersey City, New
Jersey and admits holding License 302564 and that he has been licensed to practice psychology
during all pertinent times therein. Abrams denies the balance of paragraph 4, except to state that
since about January, 1988 he has participated as a psychologist with respect to psychological
medicine at the address as stated and subsequently Psychological Health, Inc. at 135 Palisades
Avenue, Jersey City, New Jersey.

3. As to paragraphs 5 and 6, there are no allegations against Abrams and no answer is given.

4. Abrams denies the allegations of paragraph 8.

COUNT 1 (AS TO MICHAEL ABRAMS)

5. Abrams repeats his answer to the general allegations as if set forth at length herein.

6. Abrams admits the allegations of paragraph 2 as qualified by the statement that he owned 50% of the stock of the entity until sometime in 1993 when he acquired the balance.

7. Abrams admits the allegations in paragraphs 3 and 4.

8. Abrams denies the allegations in paragraphs 5, 6, a-j and l-t.

9. Abrams has no knowledge sufficient to form a belief as to the truth of the allegations of paragraph 6(k).

10. Abrams denies the allegations in paragraphs 6, 7, 8 and 9.

11. Abrams repeats his answer to the general allegations as if set forth at length herein.

12. Abrams denies the allegations in paragraphs 2 and 4.

13. Abrams admits the allegations in paragraph 3.

COUNT 3 (AS TO LIDIA DENGELEGI)

14. As to paragraph 3, there are no allegations against Abrams and no answer is given.

COUNT 4

15. Abrams repeats his answer to the general allegations as if set forth at length

herein.

16. Abrams denies the allegations in paragraphs 2, 3, 4, 5, 6, 7 and 8.

COUNT 5

17. There are no allegations against Abrams and no answer is given.

MARGULIES, WIND, HERRINGTON & KNOFF
A Professional Corporation
Attorneys for Michael S. Abrams, Ph.D.

By: _____

ROBERT E. MARGULIES

Dated: November 18, 1997

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